

Crawford, Kristie

From: Grace Colato Martinez <grace.martinez@bclplaw.com>
Sent: Monday, July 15, 2024 7:19 AM
To: tanner@keanelawllc.com; Robert Hoffman; matt@cliffordsaviolaw.com;
ryan@keanelawllc.com
Cc: 'Nicholas Savio'
Subject: RE: Francis v. Wausau - Phone Call
Attachments: Francis v Wausau Homes - Joint Motion to Extend Deadlines(615386516.2).doc

Hi Tanner,

Thank you for your email.

With respect to the J.S. Held report drafted by Christopher Wilkens, P.E. for Zurich North America, to clarify, the agreement is that we will accept Christopher Wilkens as your designated expert and the report you have already given us as your designated expert's opinions. Please supplement with the rest of the information required by Rule 26(a)(2)(iv)-(vi):

(iv) the witness's qualifications, including a list of all publications authored in the previous 10 years;

(v) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and

(vi) a statement of the compensation to be paid for the study and testimony in the case.

We also would like to ask the court to amend the impending deadlines, to be safe, while we wait for Phillips to appear. We hope to file this as a joint motion by today or tomorrow. Please see attached draft and let me know if you agree or have any edits. If you agree, please add your signature block.

Thank you,
Grace



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From: tanner@keanelawllc.com <tanner@keanelawllc.com>
Sent: Tuesday, June 18, 2024 5:01 PM
To: Robert Hoffman <Bob.Hoffman@bclplaw.com>; matt@cliffordsaviolaw.com; ryan@keanelawllc.com; Grace Colato Martinez <grace.martinez@bclplaw.com>
Cc: 'Nicholas Savio' <nick@cliffordsaviolaw.com>
Subject: RE: Francis v. Wausau - Phone Call

Bob,



It was nice talking with you today via Zoom. As we discussed, Plaintiffs previously disclosed the report of J.S.Held on 12/15/23, and again in discovery production on 3/29/24 (bates no. PLF0000200-31). You agreed that this was

sufficient to serve as Plaintiffs' disclosure of a potential expert that Plaintiffs would call to trial in this case under the Court's scheduling order.

We also discussed us needing to amend all the deadlines in the scheduling order now that Scott Phillips has been added as a Defendant in this case. You acknowledged this may be necessary, and that we would revisit how much the deadlines would need to be moved after Phillips is served and enters in the case.

Finally, we also discussed your firm accepting service of process on the additional lawsuits our firm will be filing involving Wausau, and that after we file you would check with your client to see if you could accept service.

Thanks,

Tanner

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